



**RELIEF REQUESTED**

4. The Debtors are related entities. Buzzards Bench Holdings, LLC is the 100% member of Buzzards Bench LLC. Buzzards Bench Holdings, LLC is also a guarantor on certain indebtedness owing by Buzzards Bench LLC to its lender. The Debtors seek entry of an order, substantially in the form attached hereto as Exhibit "A," directing procedural consolidation and joint administration of these chapter 11 cases. The Debtors request that one file and one docket be maintained for all of the jointly administered cases under the case of Buzzards Bench, LLC Case No. 20-32391 and that the cases be administered under a consolidated caption, as follows:

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	§	
BUZZARDS BENCH, LLC and	§	
BUZZARDS BENCH HOLDINGS, LLC,	§	Chapter 11
Debtors.	§	
	§	Case No. 20-32391
	§	
	§	Jointly Administered
	§	

5. The Debtors further request that this Court order that the foregoing caption satisfies the requirements set forth in section 342(c)(1) of the Bankruptcy Code.

6. The Debtors also request that a docket entry, substantially similar to the following be entered on the docket of each of the Debtors to reflect the joint administration of these chapter 11 cases:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure and Rule 1015-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the Southern District of Texas directing joint administration for procedural purposes only of the chapter 11 cases of: Buzzards Bench, LLC Case No. 20-32391; Buzzards Bench Holdings, LLC Case No. 20-32392. The docket in Case No. 20-32391 should be consulted for all matters affecting this case.

**BASIS FOR RELIEF**

7. Bankruptcy Rule 1015(b) provides, in pertinent part, that “[i]f . . . two or more petitions are pending in the same court by or against . . . (4) a debtor and an affiliate, the court may order a joint administration of the estates.” FED. R. BANKR. P. 1015. All of the Debtor entities are “affiliates” as that term is defined in section 101(2) of the Bankruptcy Code. Accordingly, the Bankruptcy Code and Bankruptcy Rules authorize the Court to grant the relief requested herein. Bankruptcy Local Rule 1015-1 further provides for the joint administration of related chapter 11 cases.

8. Joint administration of these chapter 11 cases will provide significant administrative convenience without harming the substantive rights of any party in interest. Many of the motions, hearings, and orders in these chapter 11 cases will affect each Debtor entity. The entry of an order directing joint administration of these chapter 11 cases will reduce fees and costs by avoiding duplicative filings and objections. Joint administration also will allow the Office of the United States Trustee for the Southern District of Texas and all parties in interest to monitor these chapter 11 cases with greater ease and efficiency.

9. Moreover, joint administration will not adversely affect the Debtors’ respective constituencies because this Motion seeks only administrative, not substantive, consolidation of the Debtors’ estates. Parties in interest will not be harmed by the relief requested, but instead will benefit from the cost reductions associated with the joint administration of these chapter 11 cases. Accordingly, the Debtors submit that the joint administration of these chapter 11 cases is in the best interest of their estates, their creditors, and all other parties in interest.

**NOTICE**

10. The Debtors will provide notice of this Motion to: (a) the Office of the United States Trustee for the Southern District of Texas; (b) counsel for 405 Redfish, LLC as prepetition administrative agent; and (c) any party that has requested notice pursuant to Bankruptcy Rule 2002.

**NO PRIOR REQUEST**

11. No prior request for the relief sought in this Motion has been made to this or any other court.

WHEREFORE, the Debtors respectfully request that the Court enter an Order granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

Respectfully submitted this 30th day of April, 2020.

**GRAY REED & McGRAW LLP**

By: /s/ Jason S. Brookner  
Jason S. Brookner  
Texas Bar No. 24033684  
Paul D. Moak  
Texas Bar No. 00794316  
Lydia R. Webb  
Texas Bar No. 24083758  
1300 Post Oak Blvd., Suite 2000  
Houston, Texas 77056  
Telephone: (713) 986-7000  
Facsimile: (713) 986-7100  
Email: [jbrookner@grayreed.com](mailto:jbrookner@grayreed.com)  
Email: [pmoak@grayreed.com](mailto:pmoak@grayreed.com)  
Email: [lwebb@grayreed.com](mailto:lwebb@grayreed.com)

**PROPOSED COUNSEL TO THE DEBTORS**

**CERTIFICATE OF SERVICE**

I hereby certify that on April 30, 2020 a true and correct copy of the foregoing pleading was served via CM/ECF to all parties authorized to receive electronic notice in this case.

/s/ Jason S. Brookner  
Jason S. Brookner